

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GREGORY COLBURN et al.,

Defendants.

Case No. 1:19-cr-10080-NMG

**DEFENDANT JOHN WILSON'S ASSENTED-TO MOTION FOR LEAVE
TO FILE UNDER SEAL A MOTION AND EXHIBITS TO EXCLUDE A WIRETAPPED
CONVERSATION BETWEEN RICK SINGER AND MARCI PALATELLA**

Defendant John Wilson respectfully moves this Court for leave to file under seal the forthcoming Motion to Exclude a Wiretapped Conversation Between Rick Singer and Marci Palatella. As with prior motions regarding documents concerning Mr. Wilson's wife, Leslie Wilson, that the Court allowed to be filed under seal (D.E. 2004), Defendants' motion will include sensitive, confidential, and potentially privileged information. Accordingly, under Local Rule 7.2, Mr. Wilson ask that the Court grant leave to file under seal: (a) the motion and supporting memorandum and (b) exhibits thereto. Mr. Wilson will provide the government unredacted copies of his motion. The government has assented to this request.

Respectfully submitted,

By his counsel

/s/ Michael Kendall

Michael Kendall (BBO #544866)

Lauren Papenhausen (BBO# 655527)

WHITE & CASE LLP

75 State Street

Boston, MA 02109-1814

Telephone: (617) 979-9310

michael.kendall@whitecase.com

lauren.papenhouse@whitecase.com

Andrew Tomback (pro hac vice)

McLaughlin & Stern, LLP

260 Madison Avenue

New York, NY 10016

Telephone: (212) 448-1100

ATomback@mclaughlinstern.com

Counsel for John Wilson

Date: September 14, 2021

LOCAL RULE 7.1(A)(2) CERTIFICATION

The undersigned counsel hereby certifies that I have conferred with counsel for the government and attempted in good faith to resolve or narrow the issues raised by this motion. The government assents to the relief requested.

/s/ Michael Kendall

Michael Kendall

CERTIFICATE OF SERVICE

I hereby certify that the above document is being filed on the date appearing in the header through the ECF system, which will send true copies to the attorneys of record.

/s/ Michael Kendall

Michael Kendall